

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-76-E

In the Matter of:

Application of Duke Energy Carolinas,

## LLC for Approval of Demand-Side

## Management and Energy Efficiency

### Rider 13, Decreasing Residential Rates

### and Increasing Non-Residential Rates

## PETITION TO INTERVENE

The Southern Alliance for Clean Energy (“SACE”) and the South Carolina Coastal Conservation League (“CCL”) (collectively, “Petitioners”) hereby petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On March 1, 2021, Duke Energy Carolinas, LLC (“DEC”) filed an application for approval of its demand side management (“DSM”) and energy efficiency (“EE”) cost recovery and incentive rider (“Rider 13”) for 2022. The proposed Rider 13 consists of components calculated under DEC’s cost recovery and incentive mechanism approved in Order 2021-32 in Docket No. 2013-298-E.

2. SACE is a regional nonprofit organization whose mission is to promote responsible and equitable energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has members who are customers of DEC and are therefore subject to the direct impacts of DEC's DSM/EE rider. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

3. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. CCL advocates for energy efficiency and supports the development of energy policy that is in the public interest of South Carolinians. CCL has members who are customers of DEC and are therefore subject to the direct impacts of DEC's DSM/EE rider. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402.

4. Petitioners participated actively in and were parties to the stipulations of settlement in Docket Nos. 2009-190-E, 2009-191-E, and also participated actively in past annual DSM/EE rider proceedings, including Docket Nos. 2020-83-E, 2018-72-E, 2017-65-E, 2016-92-E, 2015-89-E, 2014-334-E, 2013-299-E, 2012-303-E, and 2011-420-E.

5. Petitioners seek to intervene in this proceeding in order to ensure that their members' interests in promoting energy savings through cost-effective DSM and EE are represented. Petitioners are also interested in ensuring that DEC's DSM and EE programs are delivering results, and that the costs and incentives to be recovered via the rider are based on measured and verified energy savings.

6. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this docket.

Respectfully submitted this 4th day of May, 2021.

s/ Kate Lee Mixson

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**CERTIFICATE OF SERVICE**

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 4<sup>th</sup> day of May, 2021.  
s/Kate Lee Mixson